

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

WRR ENVIRONMENTAL SERVICES, INC.,

Plaintiff,

v.

Case No. 10-C-843-RTR

ADMIRAL INSURANCE COMPANY,

Defendant.

DECLARATION OF THOMAS A. JANCZEWSKI

I, Thomas A. Janczewski, pursuant to 28 U.S.C. § 1746, declare:

1. I am an attorney for Plaintiff WRR Environmental Services, Inc. (“WRR”) in this case. I make this Declaration in support of WRR’s Motion for Summary Judgment on Count I of the Complaint.

2. Attached as **Exhibit A** is a letter sent by my law firm to Admiral, enclosing a notice of potential liability received by my client from the United States Environmental Protection Agency.

3. Attached as **Exhibit B** is a copy of a Declaratory Complaint filed by Admiral against WRR in 1998, which is both a public record and has been maintained within my law firm’s files in the ordinary course of business.

4. On October 8, 2013, Defendant Admiral Insurance Company (“Admiral”) served responses to requests for the production of documents (“Supplemental Responses”) upon me.

5. Among the Supplemental Responses was Admiral’s “Claim Payment History” (Bates Nos. ADM000079–000080) showing that Admiral has not paid any amounts, for either

defense or indemnity, since 1999 and no amounts toward defense for the Lake Calumet Cluster Site. Attached as **Exhibit C** is a copy of Claim Payment History.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 31st day of October, 2013.

/s/ Thomas A. Janczewski

Thomas A. Janczewski